

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

S.L., by and through his parents and guardians,
J.L. and L.L.,

Plaintiff,

v.

PREMERA BLUE CROSS, AMAZON
CORPORATE LLC GROUP HEALTH AND
WELFARE PLAN, and AMAZON
CORPORATE LLC,

Defendants.

NO. 2:18-cv-01308-RSL

DECLARATION OF

J. [REDACTED] L. [REDACTED]

**Noted for Consideration:
September 21, 2018**

I, J. [REDACTED] L. [REDACTED], of full age, hereby declare as follows:

1. I am the father of S.L., the plaintiff in this matter.

2. During the period outlined in the Complaint, S.L. was diagnosed with multiple serious mental health and substance use disorders. In order to protect S.L.'s privacy and freedom from stigma, my wife, S.L. and I have only told close friends, family and his health care providers about the specifics of his diagnoses, his suicidality, his need for treatment, and this dispute with Premera and the Plan.

3. We keep much of this information private because we are concerned that if S.L.'s identity is disclosed in this litigation, the stigma attached to these diagnoses

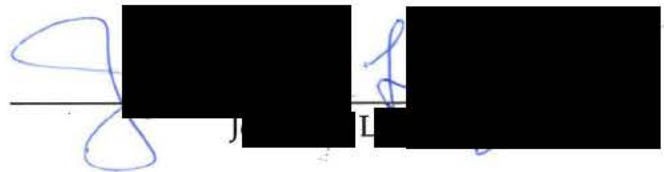
DECLARATION OF J. [REDACTED] L. [REDACTED] - 1
[Case No. 2:18-cv-01308-RSL]

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1 could impact his ability to attend the college of his choice, obtain future employment,
2 rent housing, among other future activities. We are also very concerned that public
3 disclosure of the events leading up to S.L.'s treatment and his condition could cause him
4 psychological and other harm. If the Court were to rule that S.L.'s identity would be
5 public, we would seriously consider dropping the lawsuit. There is no other reason that
6 we seek the use of redaction and pseudonyms in this case.

7 Pursuant to 28 U.S.C. § 1746(2), I certify under penalty of perjury that the
8 foregoing is true and correct.

9 DATED: September 4, 2018, at Seattle, Washington.

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CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

- **Eleanor Hamburger**
ehamburger@sylaw.com, matt@sylaw.com, stacy@sylaw.com, theresa@sylaw.com
- **Gwendolyn C. Payton**
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- **Richard E Spoonemore**
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I further certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

- (No manual recipients)

DATED: September 12, 2018, at Seattle, Washington.

/s/ Eleanor Hamburger
Eleanor Hamburger (WSBA #26478)
ehamburger@sylaw.com